

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CASE NO. 00-6035-Cr-Zloch

Magistrate Seltzer

UNITED STATES OF AMERICA, :

Plaintiff, :

v. :

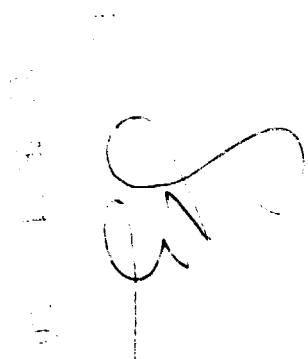
RAYMOND MCDERMOTT and :

MARTHA TREMINIO DIAZ a/k/a :

MARTHA MCDERMOTT, :

Defendants. :

_____ /



UNOPPOSED MOTION FOR LEAVE TO TRAVEL

Defendants, Raymond McDermott and Martha Treminio Diaz (a/k/a Martha McDermott), by and through their undersigned counsel, hereby move this Court to grant them permission to travel to Sanibel Island in the Middle District of Florida from Friday, April 21, 2000 to Monday, April 24, 2000 and in support of this Motion would show:

1. Both Defendants are charged by Indictment with assaulting an internationally protected person. Raymond McDermott is charged in an additional count with threatening to assault an internationally protected person.

2. Both Defendants were granted pretrial release. A standing condition of said pretrial release is that they not leave the Southern District of Florida.



3. Both Defendants have entered into a written Plea Agreement with the government in which they have agreed to plead guilty to Count 2 of the Indictment. The case has been scheduled by the Court for a change of plea hearing on Friday, May 5, 2000 at 10:30 a.m.

4. The Defendants, who are husband and wife, have made plans to drive to Sanibel Island, in the Middle District of Florida, for a family reunion during the weekend of April 21st through April 24, 2000. If permission to travel is granted, they will be staying at a hotel called "The Castways at Blindpass" in Sanibel Island. The address is 6460 Sanibel - Captiva Road, Sanibel Island, Florida. The telephone number is (877) 232-2448. The McDermotts plan to drive to the hotel on Friday, April 21st and return on Monday, April 24, 2000.

5. Assistant United States Attorney Debra J. Stuart has **no objection** to the Court granting this Motion to Travel.

WHEREFORE, Defendants respectfully move this Court to enter the attached Order granting them permission to travel to Sanibel Island during the weekend of April 21, 2000.

Respectfully submitted

**BIERMAN, SHOHAT,
LOEWY & KLEIN, P.A.**
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BY: _____

IRA N. LOEWY, ESQ., #200794

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was delivered by facsimile this 20th day of April, 2000, to: Debra J. Stuart, Esq., Assistant United States Attorney, 500 East Broward Boulevard, Suite 700, Ft. Lauderdale, Florida 33394, and to Darwin L. Crenshaw, U. S. Pretrial Service Officer, 299 E. Broward Boulevard, Suite 301, Ft. Lauderdale, FL 33301.



IRA N. LOEWY, ESQ.